

**EXHIBIT 1: PROPOSED ORDER**

4813-9117-9038.2

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----X	:	
IN RE	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
DEBTOR	:	Hon. Steven W. Rhodes
-----X	:	

**ORDER RESOLVING OMNIBUS CLAIMS OBJECTION WITH RESPECT TO  
CLAIMS FILED BY THE AMALGAMATED TRANSIT UNION LOCAL 26 AFL-CIO,  
AARON SCOTT AND MITCHELL CLIFTON**

This matter having come before the Court on the *Stipulation to Entry of Order Resolving Omnibus Claims Objection With Respect to Claims Filed by the Amalgamated Transit Union Local 26 AFL-CIO, Aaron Scott and Mitchell Clifton* (the “Stipulation”); the Claimants<sup>1</sup> having filed Claim Nos. 937, 940, and 944 in the above-captioned bankruptcy case, and indicated some portion of the Bredhoff Claims were claims entitled to priority under Section 503(b)(9) of the Bankruptcy Code; the City having filed the Claim Objection asserting that no portion of the Bredhoff Claims met the standards for claims entitled to priority under Section 503(b)(9) of the Bankruptcy Code; the Claimants agreeing that the Bredhoff Claims are not entitled to such priority; and the Court being otherwise fully informed:

**IT IS HEREBY ORDERED THAT:**

1. Claim Nos. 937, 940, and 944 are not claims entitled to priority under Section 503(b)(9) of the Bankruptcy Code, and will not be classified as such.

---

<sup>1</sup> Capitalized terms not defined herein have the meanings ascribed to them in the Stipulation.

2. The Claimants reserve their rights, if any, to amend the Bredhoff Claims to assert priority status for some or all of the Bredhoff Claims, other than a priority under Section 503(b)(9) of the Bankruptcy Code, and the City reserves all rights to object to any such amendments and/or assertions of priority status.

3. The City reserves all of its rights to object to the Bredhoff Claims on any other grounds and the Claimants reserve all of their rights to respond to any such objections.